

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
APR 16 2025
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,)	<u>SUPERSEDING INDICTMENT</u>
)	
Plaintiff,)	JUDGE BRIDGET MEEHAN BRENNAN
)	
v.)	CASE NO. <u>1:24CR424</u>
)	Title 18, United States Code,
CHRISTION YARNELL SIMS,)	Sections 2, 924(c)(1)(A)(ii), 1951,
)	2119(1), 981(a)(1)(C)
Defendant.)	
)	

COUNT 1

(Interference with Commerce by Robbery, 18 U.S.C. §§ 1951(a) and 2)

The Grand Jury charges:

1. On or about July 29, 2024, in the Northern District of Ohio, Eastern Division, Defendants CHRISTION YARNELL SIMS, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that Defendant, CHRISTION YARNELL SIMS, did unlawfully take and obtain money or property in the custody, possession, and presence of employees and/or subcontractors of Vantage Technical Services and/or Brinks, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 2

(Carjacking, 18 U.S.C. § 2119(1) & 2)

The Grand Jury further charges:

2. On or about July 29, 2024, in the Northern District of Ohio, Eastern Division, Defendants CHRISTION YARNELL SIMS did take a motor vehicle, to wit: a 2018 Nissan NV Cargo Van, bearing VIN 1N6BF0LY5JN808208, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of Vantage Technical Services and/or Brinks employees and/or subcontractors, specifically B.O. and R.L.W, persons known to the grand jury, by force, violence, and intimidation, with the intent to cause death and serious bodily harm, in violation of Title 18, United States Code, Section 2119(1).

COUNT 3

(Using and Carrying a Firearm During and in Relation to a Crime of Violence,
18 U.S.C. §§ 924(c)(1)(A)(ii) & 2)

The Grand Jury further charges:

3. On or about July 29, 2024, in the Northern District of Ohio, Eastern Division, Defendant CHRISTION YARNELL SIMS did knowingly aid or abet another to use, carry, and brandish a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, to wit: Hobbs Act Robbery, as charged in Count 1, and Carjacking, as charged in Count 2, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT 4

(Interference with Commerce by Robbery, 18 U.S.C. §§ 1951(a) and 2)

The Grand Jury further charges:

4. On or about September 23, 2024, in the Northern District of Ohio, Eastern Division, Defendants CHRISTION YARNELL SIMS, did unlawfully obstruct, delay and affect

commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that Defendant, CHRISTION YARNELL SIMS, did unlawfully take and obtain money or property in the custody, possession, and presence of employees and/or subcontractors of Vantage Technical Services and/or Brinks and/or Constant Security Protective Services, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 5

(Using and Carrying a Firearm During and in Relation to a Crime of Violence,
18 U.S.C. §§ 924(c)(1)(A)(ii) & 2)

The Grand Jury further charges:

5. On or about September 23, 2024, in the Northern District of Ohio, Eastern Division, Defendant CHRISTION YARNELL SIMS did knowingly aid or abet another to use, carry, and brandish a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: Hobbs Act Robbery, as charged in Count 4, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

FORFEITURE

The Grand Jury further charges:

4. The allegations of Counts 1 through 5 are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). As a result of such offenses, Defendant CHRISTION YARNELL SIMS shall forfeit to the United States all property, real and personal, which constitutes, or is derived from proceeds traceable to the commission of Counts 1 and 4, including but not limited to a 2017

Black BMW X5 bearing VIN: 5UXKR2C36H0X04634, purchased by CHRISTION YARNELL SIMS; and all firearms and ammunition involved in or used in violation of Counts 3 and 5.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.